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Attorneys for Defendant
CRANE CO.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

PATRICIA J. COVEY-HINZO, individually
and as successor in interest to GILBERT E.
HINZO, Deceased, ALEX HINZO, an
individual, and FELICIA WATSON, an
individual,

Plaintiffs,

v.

ASBESTOS DEFENDANTS et al.

Defendants

Case No. C 15-00241 WHA (Lead Case)

**AMENDED JOINT STIPULATION AND
~~PROPOSED~~ ORDER TO CONTINUE
EXPERT REPORT DEADLINES**

WHEREAS, the Court's March 27, 2015 Scheduling Order provides for a briefing schedule on expert reports as follows:

1. The last date for designation of expert testimony and disclosure of full expert reports under FRCP 26(a)(2) as to any issue on which a party has the burden of proof ("opening reports") shall be DECEMBER 18, 2015.

2. Within **FOURTEEN CALENDAR DAYS** of said deadline, all other parties must disclose any expert reports on the same issue ("opposition reports")

3. Within **SEVEN CALENDAR DAYS** thereafter, the party with the burden of proof must

disclose any reply reports rebutting specific material in opposition reports (“rebuttal reports”).

4. The cutoff for all expert discovery shall be FOURTEEN CALENDAR DAYS after the deadline for reply reports.

WHEREAS, pursuant to the Court’s March 27, 2015 scheduling order, non-expert discovery closes on December 18, 2015;

WHEREAS, Plaintiffs first identified the only known witness with information about Decedent’s work history on November 12, 2015;

WHEREAS, the deposition of this witness has been noticed for December 8, 2015;

WHEREAS, the parties have agreed that the late timing of the disclosures of the only potential product identification witness will make it impracticable for the parties to adhere to the Court’s expert report deadlines.

WHEREAS on November 30, 2015 this Court entered an Order based on a Stipulation that incorrectly called for the expert report deadlines to be continued to January 7, 2015 rather than 2016.

WHEREAS with the exception of the corrected date for the expert report deadlines, this Stipulation and Proposed Order is substantively the same as that filed with this Court on November 25, 2015.

IT IS HEREBY STIPULATED AND AGREED that the deadline for designation of expert testimony and disclosure of full expert reports under FRCP 26(a)(2) as to any issue on which a party has the burden of proof (“opening reports”) shall be continued to January 7, 2016. All other deadlines in the Court’s scheduling order shall remain in place.

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K&L Gates LLP

Dated: November 30, 2015

By: /s/ Peter E. Soskin
Peter E. Soskin
Attorneys for Defendant Crane Co.

HUGO PARKER LLP

Dated: November 30, 2015

By: /s/ Lisa Rickenbacher
Lisa Rickenbacher
Attorneys for Defendant General Dynamics
Corporation

Armstrong & Associates, LLP

Dated: November 30, 2015

By: /s/ William Armstrong
William Armstrong
Attorneys for Defendant
Crown Cork & Seal Company, Inc. and
Crown Holdings, Inc.

Nixon & Peabody LLP

Dated: November 30, 2015

By: /s/ Lauren Michals
Lauren Michals
Attorneys for Defendant
Harsco Corporation

Leader & Berkon LLP

Dated: November 30, 2015

By: /s/ Bobbie Rae Bailey
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Attorneys for Defendant
IMO Industries, Inc.

**Prindle, Amaro, Goetz, Hillyard,
Barnes & Reinholz LLP**

Dated: November 30, 2015

By: /s/ Carla Lynn Crochet
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Ingersoll Rand Company and
Syd Carpenter, Marine Contractor, Inc.

Morgan Lewis & Bockius LLP

Dated: November 30, 2015

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McKenna, Long & Aldridge

Dated: November 30, 2015

By: /s/ Lisa Oberg
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Metalclad Insulation LLC

Steptoe and Johnson LLP

Dated: November 30, 2015

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Metropolitan Life Insurance Company

The Davis Law Firm

Dated: November 30, 2015

By: /s/ Whitney Davis
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Attorneys for Defendant
Viad Corporation

Tucker Ellis LLP

Dated: November 30, 2015

By: /s/ James Cunningham
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Attorneys for Defendant
Warren Pumps, LLC

Pond North LLP

Dated: November 30, 2015

By: /s/ Frank Pond
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Attorneys for Defendants
CBS Corporation, a Delaware corporation
f/k/a/ Viacom, Inc., successor by merger to
CBS Corporation, a Pennsylvania
corporation, f/k/a Westinghouse Electric
Corporation; and FMC Corporation on behalf
of its former Northern Pump business

Heard Robins Cloud LLP

Dated: November 30, 2015

By: /s/ Sara Morton


Sara Morton

Attorneys for Plaintiffs

1 **PURSUANT TO STIPULATION**, the deadline for designation of expert testimony and
2 disclosure of full expert reports under FRCP 26(a)(2) as to any issue on which a party has the burden
3 of proof (“opening reports”) shall be continued to January 7, 2016. All other deadlines in this Court’s
4 scheduling order shall remain in place.

5 **IT IS SO ORDERED.**

6
7 Dated: November 30, 2015.


Honorable William Alsup
Judge, United States District Court
Northern District of California